

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW MEXICO**

In re:

LINDA ROSE GHAFFARI,

Debtor.

No. **11-12331 t11**

**DEBTOR'S OBJECTION TO MOTION FOR RELIEF FROM
AUTOMATIC STAY AND TO ABANDON PROPERTY KNOWN AS
11323 BLYTHE ST., SUN VALLEY, CALIFORNIA 91352**

COMES NOW Linda Rose Ghaffari, Debtor (the “**Debtor**”), by counsel, and objects to the *Motion for Relief from Automatic Stay and to Abandon Property Known as 11323 Blythe St., Sun Valley, California 91352* (the “**Motion**”), filed November 25, 2019 (Doc. 161), by U.S. Bank N.A., as Trustee, successor in interest to Bank of America, N.A., as Trustee, successor by merger to LaSalle Bank, N.A., as Trustee for Merrill Lynch First Franklin Mortgage Loan Trust, Mortgage Pass-through Certificates, Series 2007-1 (“**Movant**”), and as grounds would show:

1. Debtor is still attempting a loan modification with Movant, and will initiate this process anew; and
2. The Subject Property is necessary for reorganization;

WHEREFORE, Debtor prays that the relief sought in the Motion be denied, and for such other relief as the Court deems proper.

Respectfully submitted by:
Askew & Mazel, LLC
Counsel for Debtor
s\Submitted electronically
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This certifies that on December 16, 2019,

a copy of the foregoing pleading was served by the Bankruptcy Court's electronic filing system on all parties who have entered an appearance in this case.

s/ submitted electronically
George M. Moore